

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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) **MASTER FILE NO. 04-10027**  
IN RE ORGANOGENESIS SECURITIES )  
LITIGATION ) **JLT**  
 )  
 ) **MOTION FOR LEAVE TO**  
 ) **FILE CORRECTED**  
 ) **CONSOLIDATED AMENDED**  
 ) **CLASS ACTION COMPLAINT**  
 ) **FOR VIOLATIONS OF**  
 ) **FEDERAL SECURITIES LAWS**  
)

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Court-appointed Lead Plaintiffs Bruno Hoffman, John H. Bowie, Richard Madigan, and Richard Conen (collectively, "Lead Plaintiffs"), by their counsel, respectfully move this Court for leave to file a Corrected Consolidated Amended Class Action Complaint for Violations of Federal Securities Laws ("Corrected Amended Complaint"), in the form attached hereto as Exhibit A. As grounds for this Motion, Lead Plaintiffs state that based on information received from counsel for defendant Herbert Stein after the filing of the consolidated amended complaint, Lead Plaintiffs seek to correct an allegation concerning defendant Stein with respect to his alleged sale of the stock of non-party Organogenesis, Inc. ("Organogenesis" or the "Company"), to clarify the particular Company filings with the Securities Exchange Commission that defendant Stein signed during the Class Period, and to make certain corrections relating to the stock sales of other Company insiders, including defendant Sabolinski and Company insiders Anton Schrafl and Nancy Parenteu. Plaintiffs also seek to make certain typographical

corrections and other clarifications to the amended complaint. For the Court's convenience in identifying the proposed revisions to the amended complaint, Lead Plaintiffs have attached hereto as Exhibit B a red-lined copy of the revised paragraphs of Lead Plaintiffs' proposed Corrected Amended Complaint.

Respectfully submitted,

Dated: December 22, 2004

**MOULTON & GANS, P.C.**

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**RULE 7.1(A) CERTIFICATE**

I, Nancy Freeman Gans, Liaison Counsel, hereby certify that on December 8, 2004 and December 12, 2004, I conferred with the following counsel for defendants concerning the filing of the above Motion for Leave To File Corrected Consolidated Amended Complaint: Matt Matule, Esq., Skadden Arps Slate Meagher & Flom, LLP for PricewaterhouseCoopers, LLP; Peter Saparoff, Esq., Mintz, Levin, Cohn, Ferris Glovsky & Popeo, PC, for Herbert Stein; and Jonathan Shapiro, Esq. of Hale & Dorr, LLP for Donna Abelli Lopolito, Michael Sabolinski, Philip Laughlin, Alan Ades and Albert Erani. Mr. Shapiro and Mr. Matule do not oppose the motion and Mr. Saparoff reserves his position with respect to the motion.

**CERTIFICATE OF SERVICE**

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party.

/s/ Nancy Freeman Gans  
Nancy Freeman Gans